

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS ON ) Civil Action No. 03 MDL 1570 (GBD) (SN)  
SEPTEMBER 11, 2001 ) ECF Case  
)

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This document relates to: *All Actions*

**DECLARATION OF GREGORY G. RAPAWY  
IN SUPPORT OF DEFENDANT KINGDOM OF SAUDI ARABIA'S  
REPLY IN SUPPORT OF ITS RENEWED MOTION TO DISMISS**

I, Gregory G. Rapawy, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I respectfully submit this Declaration in Support of Defendant Kingdom of Saudi Arabia's Reply in Support of Its Renewed Motion To Dismiss.
2. I am a partner in the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., which represents the Kingdom of Saudi Arabia ("Saudi Arabia") in this litigation. The following facts are based on my personal knowledge or on information provided to me. If called upon as a witness, I could and would testify competently to them.
3. The exhibits to this declaration are numbered consecutively with the exhibits to my October 27, 2023 Corrected Declaration in Support of Defendant Kingdom of Saudi Arabia's Renewed Motion To Dismiss.
4. Attached as Exhibit 160 is a true and correct copy of the Kingdom of Saudi Arabia's Response to Plaintiffs' Corrected Averment of Facts and Evidence in Support of Their Claims Against the Kingdom of Saudi Arabia and Dallah Avco in Response to ECF Nos. 9362 and 9368. *See* ECF No. 9541-1.
5. Attached as Exhibit 161 is a true and correct copy of Saudi Arabia's Evidentiary Objections to Exhibits Cited in Plaintiffs' Opposition and Averment.
6. Attached as Exhibit 162A is a true and correct copy of Saudi Arabia's Evidentiary Objections to Documents Not Cited by Plaintiffs. Attached as 162B is a true and correct copy of a chart listing exhibits Plaintiffs submitted with their opposition but did not cite in their brief or averment to which Saudi Arabia does not assert an evidentiary objection.
7. Attached as Exhibit 163 is a true and correct copy of excerpts of the 9/11 Commission Report.

8. Attached as Exhibit 164 is a true and correct copy of excerpts of the publicly released version of a March 2015 report titled “The FBI: Protecting the Homeland in the 21st Century” by the 9/11 Review Commission.

9. Attached as Exhibit 165 is a true and correct copy of excerpts of the final transcript of the June 15, 2022 deposition of Emile A. Nakhleh, Ph.D.

10. Attached as Exhibit 166 is a true and correct copy of the Rebuttal Expert Report of David H. Rundell, dated May 16, 2022.

11. Attached as Exhibit 167 is a true and correct copy of the Rebuttal Expert Report of Marc Sageman, dated May 16, 2022.

12. Attached as Exhibit 168 is a true and correct copy of a document produced by AT&T in this litigation in response to a subpoena served by Plaintiffs.

13. Attached as Exhibit 169 is a true and correct copy of a document bearing Bates numbers KSA0000008756 to KSA0000008767, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

14. Attached as Exhibit 170 is a true and correct copy of a document bearing Bates number KSA0000000598, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

15. Attached as Exhibit 171 is a true and correct copy of a document bearing Bates number KSA0000008490, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

16. Attached as Exhibit 172 is a true and correct copy of a document bearing Bates number KSA0000001277, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

17. Attached as Exhibit 173 is a true and correct copy of Exhibit 606 from the April 21, 2021 deposition of Ismail (Smail) Ammar Mohamed Mana. It consists of a document bearing Bates number KSA0000007151, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

18. Attached as Exhibit 174 is a true and correct copy of a document bearing Bates number KSA0000008491, which was produced by Saudi Arabia in this litigation.

19. Attached as Exhibit 175 is a true and correct copy of a document bearing Bates number KSA0000001717, which was produced by Saudi Arabia in this litigation.

20. Attached as Exhibit 176 is a true and correct copy of a document bearing Bates numbers KSA0000005328 to KSA0000005330, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

21. Attached as Exhibit 177 is a true and correct copy of a document bearing Bates number KSA0000008467, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

22. Attached as Exhibit 178 is a true and correct copy of excerpts of the Expert Report of Marc Sageman, dated August 6, 2020.

23. Attached as Exhibit 179 is a true and correct copy of a webpage titled “Imams” from the public-facing website of the Islamic Center of San Diego. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.icsd.org/imams.html> and created the copy on February 6, 2024.

24. Attached as Exhibit 180 is a true and correct copy of the Declaration of Bandar Fahad A. Alzaid, executed on October 6, 2023.

25. Attached as Exhibit 181 is a true and correct copy of the Declaration of Dr. Fawzy Abdulghani Q. Bukhari, executed on October 6, 2023.

26. Attached as Exhibit 182 is a true and correct copy of a document bearing Bates numbers FBI009277 to FBI009278, which was produced by the FBI in this litigation.

27. Attached as Exhibit 183 is a true and correct copy of a document bearing Bates number KSA0000008435, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

28. Attached as Exhibit 184 is a true and correct copy of a document bearing Bates numbers FBI001047 to FBI001054, including one revised page at FBI001048REVISED, which was produced by the FBI in this litigation.

29. Attached as Exhibit 185 is a true and correct copy of a document bearing Bates number KSA0000008413, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

30. Attached as Exhibit 186 is a true and correct copy of a document bearing Bates numbers KSA0000008368 to KSA0000008379, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

31. Attached as Exhibit 187 is a true and correct copy of a document bearing Bates number KSA0000000591, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

32. Attached as Exhibit 188 is a true and correct copy of a document bearing Bates number KSA0000002768, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

33. Attached as Exhibit 189 is a true and correct copy of Exhibit 436 from the February 23, 2021 deposition of Saud bin Abdullah bin Abdulrahman Al Ghudaian. It consists of a document bearing Bates number KSA000000590, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

34. Attached as Exhibit 190 is a true and correct copy of a document bearing Bates number KSA0000002784, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

35. Attached as Exhibit 191 is a true and correct copy of Exhibit 844 from the June 28-30, 2021 deposition of Fahad Al Thumairy. It consists of a document bearing Bates number FBI000368, which was produced by the FBI in this litigation.

36. Attached as Exhibit 192 is a true and correct copy of a document bearing Bates numbers KSA0000002661 to KSA0000002664, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

37. Attached as Exhibit 193 is a true and correct copy of a document bearing Bates number KSA0000008544, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

38. Attached as Exhibit 194 is a true and correct copy of a document bearing Bates number KSA0000002688, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

39. Attached as Exhibit 195 is a true and correct copy of a document bearing Bates number KSA0000007376, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

40. Attached as Exhibit 196 is a true and correct copy of a document bearing Bates number KSA0000007375, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

41. Attached as Exhibit 197 is a true and correct copy of a document bearing Bates number KSA0000001291, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

42. Attached as Exhibit 198 is a true and correct copy of a document bearing Bates numbers KSA0000007658 to KSA0000007659, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

43. Attached as Exhibit 199 is a true and correct copy of a document bearing Bates number KSA0000006595, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

44. Attached as Exhibit 200 is a true and correct copy of a document bearing Bates number KSA0000006964, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

45. Attached as Exhibit 201 is a true and correct copy of a document bearing Bates number KSA0000000609, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

46. Attached as Exhibit 202 is a true and correct copy of a document bearing Bates number KSA0000007978, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

47. Attached as Exhibit 203 is a true and correct copy of Exhibit 480 from the March 24, 2021 deposition of Saleh Bin Abdulaziz Al Ash-Sheikh. It consists of a document bearing

Bates numbers KSA0000000606 to KSA0000000607, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

48. Attached as Exhibit 204 is a true and correct copy of a document bearing Bates number KSA0000001776, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

49. Attached as Exhibit 205 is a true and correct copy of a document bearing Bates number KSA0000001224, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

50. Attached as Exhibit 206 is a true and correct copy of a document bearing Bates number KSA0000001225, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

51. Attached as Exhibit 207 is a true and correct copy of a document bearing Bates number KSA0000000612, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

52. Attached as Exhibit 208 is a true and correct copy of a document bearing Bates number KSA0000001204, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

53. Attached as Exhibit 209 is a true and correct copy of a document bearing Bates number KSA0000000568, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

54. Attached as Exhibit 210 is a true and correct copy of a document bearing Bates numbers KSA0000007196 to KSA0000007198, which was produced by Saudi Arabia in this litigation.

55. Attached as Exhibit 211 is a true and correct copy of Exhibit 741 from the June 9-11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates numbers KSA0000001837 to KSA0000001840, which was produced by Saudi Arabia in this litigation, and an English translation of the same. The translation is not certified, but was introduced at Al Bayoumi's deposition without objection.

56. Attached as Exhibit 212 is a true and correct copy of Exhibit 742 from the June 9-11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates number KSA0000000908, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

57. Attached as Exhibit 213 is a true and correct copy of Exhibit 744 from the June 9-11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates number KSA0000000739, which was produced by Saudi Arabia in this litigation.

58. Attached as Exhibit 214 is a true and correct copy of a document bearing Bates number KSA000000740, which was produced by Saudi Arabia in this litigation.

59. Attached as Exhibit 215 is a true and correct copy of Exhibit 745 from the June 9-11, 2021 deposition of Omar Al Bayoumi. It consists of a document bearing Bates number KSA0000000741, which was produced by Saudi Arabia in this litigation.

60. Attached as Exhibit 216 is a true and correct copy of a document bearing Bates numbers PECFOIA00041956 to PECFOIA00042133, which was produced by Plaintiffs in this litigation.

61. Attached as Exhibit 217 is a true and correct copy of the Subpoena to the Federal Bureau of Investigation issued by the *Ashton* Plaintiffs on December 21, 2023 in this litigation.

62. Attached as Exhibit 218 is a true and correct copy of a document bearing Bates numbers FBI001534 to FBI001538, which was produced by the FBI in this litigation.

63. Attached as Exhibit 219 is a true and correct copy of a document bearing Bates numbers KFM0000461 to KFM0000468, which was produced by the King Fahad Mosque in this litigation.

64. Attached as Exhibit 220 is a true and correct copy of a document bearing Bates numbers KSA0000007596 to KSA0000007597, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

65. Attached as Exhibit 221 is a true and correct copy of a document bearing Bates numbers KSA0000007884 to KSA0000007885, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

66. Attached as Exhibit 222 is a true and correct copy of excerpts of the Expert Report of Brian Michael Jenkins, dated March 10, 2020.

67. Attached as Exhibit 223 is a true and correct copy of an excerpt from the book *Masterminds of Terror: The truth behind the most devastating terrorist attack the world has ever seen* (Arcade Publishing 2003) by Yosri Fouda and Nick Fielding. The excerpt consists of a chapter titled “Unlocking the Masterminds.”

68. Attached as Exhibit 224 is a true and correct copy of an excerpt of the document bearing the file name “Letter-from-Bin-Laden-Original1,” which is posted on the Combating Terrorism Center at West Point’s public-facing website at <https://ctc.westpoint.edu/harmony-program/letter-from-bin-laden-original-language-2/>, and a certified English translation of the same.

69. Attached as Exhibit 225 is a true and correct copy of an excerpt from the book *The Afghanistan File* (Isle of Write: Arabian Publishing 2021) by Prince Turki al Faisal al Saud. The excerpt consists of a chapter titled “The Taliban and Bin Laden.”

70. Attached as Exhibit 226 is a true and correct copy of a document bearing Bates numbers FBI003267 to FBI003271, which was produced by the FBI in this litigation.

71. Attached as Exhibit 227 is a true and correct copy of excerpts of the publicly released version of a June 2003 report titled “Workplan: Issues Relating to the FBI Informant with Whom 9/11 Hijackers Nawaf al-Hazmi and Khalid al-Mihdhar Resided” by the National Commission on Terrorist Attacks Upon the United States.

72. Attached as Exhibit 228 is a true and correct copy of an excerpt from the book *Objective Troy: A Terrorist, a President, and the Rise of the Drone* (Tim Duggan Books 2015) by Scott Shane. The excerpt consists of a chapter titled “He Had A Beautiful Tongue.”

73. Attached as Exhibit 229 is a true and correct copy of the article “Jihadism in Norway: a Typology of Militant Networks in a Peripheral European Country” (New York Times, January 23, 2020, updated September 12, 2021) by Brynjar Lia and Petter Nesser in *Perspectives on Terrorism* (Volume 10, Issue 6, December 2016). Kellogg Hansen employees acting under my supervision obtained the document from

<https://pt.icct.nl/sites/default/files/import/pdf/612-jihadism-in-norway-a-typology-of-militant-networks-in-a-peripheral-european-country-by-brynjar-lia-and-petter-nesser.pdf> and created the copy on February 6, 2024.

74. Attached as Exhibit 230 is a true and correct copy of an excerpt of the document bearing the file name “43-D0916\_Habib-Bayoumi-mosque-papers - OCR.” The document was produced by Plaintiffs in this litigation. See ECF No. 7957-1. At the time of production,

Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.* The second page of Exhibit 230 is a handwritten translation of the third page that was included with the documents as produced.

75. Attached as Exhibit 231 is a true and correct copy of an excerpt of the document bearing the file name "681 - D0863-X0290." The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

76. Attached as Exhibit 232 is a true and correct copy of a document bearing Bates number KSA0000000726, which was produced by Saudi Arabia in this litigation.

77. Attached as Exhibit 233 is a true and correct copy of a document bearing Bates numbers FBI009273 to FBI009274, which was produced by the FBI in this litigation.

78. Attached as Exhibit 234 is a true and correct copy of Exhibit 584 from the April 7 and April 9, 2021 deposition of Abdullah Al Jaithen. It consists of a webpage and a certified English translation of the same.

79. Attached as Exhibit 235 is a true and correct copy of an excerpt from the book *Stop the War: The story of Britain's biggest mass movement* (Bookmarks Publications 2005) by Andrew Murray and Lindsey German. The excerpt consists of a chapter titled "Hearts and Minds."

80. Attached as Exhibit 236 is a true and correct copy of the article "Millions join global antiwar protests" (BBC News, February 17, 2003). Kellogg Hansen employees acting under my supervision obtained the document from <http://news.bbc.co.uk/2/hi/europe/2765215.stm> and created the copy on February 6, 2024.

81. Attached as Exhibit 237 is a true and correct copy of the publicly released version of the “GTMO Detainee Assessment” for Walid Bin Attash, also known as Khallad, which is posted on the New York Times’ website at <https://int.nyt.com/data/documenttools/82931-isn-10014-walid-bin-attash-jtf-gtmo-detainee/10b3eaec3899d1f0/full.pdf>. Kellogg Hansen employees acting under my supervision obtained the document and created the copy on February 6, 2024.

82. Attached as Exhibit 238 is a true and correct copy of an excerpt from the book *The Black Banners: The Inside Story of 9/11 and the War Against al-Qaeda* (W.W. Norton & Co. 2011) by Ali H. Soufan. The excerpt consists of chapter 12 titled “What Is al-Qaeda Doing in Malaysia?” and chapter 13 titled “Bin Laden’s Errand Boy.”

83. Attached as Exhibit 239 is a true and correct copy of an excerpt of the publicly released version of the trial transcript filed in *United States v. Bin Laden*, No. 98-cr-1023 (S.D.N.Y.).

84. Attached as Exhibit 240 is a true and correct copy of the publicly released version of the “GTMO Detainee Assessment” for Encep Nurjaman, also known as Hambali, which is posted on the New York Times’ website at <https://int.nyt.com/data/documenttools/82494-isn-10019-hambali-riduan-isamuddin-jtf-gtmo/2e16d7dd564573db/full.pdf>. Kellogg Hansen employees acting under my supervision obtained the document and created the copy on February 6, 2024.

85. Attached as Exhibit 241 is a true and correct copy of the publicly released version of the “GTMO Detainee Assessment” for Khalid Shaykh Muhammad, which is posted on the New York Times’ website at <https://int.nyt.com/data/documenttools/82528-isn-10024-khalid->

shaikh-mohammed-jtf-gtmo/c629488fa6d90379/full.pdf. Kellogg Hansen employees acting under my supervision obtained the document and created the copy on February 6, 2024.

86. Attached as Exhibit 242 is a true and correct copy an excerpt of the Concise Dictionary of Islam, defining “Laylat al-Qadr.”

87. Attached as Exhibit 243 is a true and correct copy of a document bearing Bates numbers FBI003281 to FBI003288, and bearing an additional label in the bottom right corner stating “CORRECTED VERSION,” which was produced by the FBI in this litigation.

88. Attached as Exhibit 244 is a true and correct copy of an excerpt from the book *The London Bombings* (University of Pennsylvania Press 2019) by Marc Sageman. The excerpt consists of chapter 3 titled “Theseus,” chapter 4 titled “Vivace,” and chapter 5 titled “Overt.”

89. Attached as Exhibit 245 is a true and correct copy of the Declaration of Michael C. McGarrity, executed on September 12, 2019.

90. Attached as Exhibit 246 is a true and correct copy of a document bearing Bates numbers FBI000079 to FBI000095, which was produced by the FBI in this litigation.

91. Attached as Exhibit 247 is a true and correct copy of a document bearing Bates numbers FBI000244 to FBI000246, which was produced by the FBI in this litigation.

92. Attached as Exhibit 248 is a true and correct copy of a document bearing Bates numbers FBI000350 to FBI000360, which was produced by the FBI in this litigation.

93. Attached as Exhibit 249 is a true and correct copy of [REDACTED]  
[REDACTED].

94. Attached as Exhibit 250 is a true and correct copy of a document bearing Bates numbers FBI000204 to FBI000207, which was produced by the FBI in this litigation.

95. Attached as Exhibit 251 is a true and correct copy of a document bearing Bates numbers BANA ALB 0001 to BANA ALB 0003, which was produced by Bank of America in this litigation in response to a subpoena served by Plaintiffs.

96. Attached as Exhibit 252 is a true and correct copy of a document bearing Bates numbers BANA ALB 0004 to BANA ALB 0005, which was produced by Bank of America in this litigation in response to a subpoena served by Plaintiffs.

97. Attached as Exhibit 253 is a true and correct copy of the document bearing the file name “703 - D0886-X0318.” The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

98. Attached as Exhibit 254 is a true and correct copy of an excerpt of the document bearing the file name “726 - D0884-X0351.” The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

99. Attached as Exhibit 255 is a true and correct copy of an excerpt of the document bearing the file name “374 - 2001 09-23 Bayoumi Interview Transcript B.” The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

100. Attached as Exhibit 256 is a true and correct copy of an excerpt of the document bearing the file name “400 - 2001 09-27 Bayoumi Interview Transcript B.” The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production,

Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

101. Attached as Exhibit 257 is a true and correct copy of an excerpt of the document bearing the file name "394 - 2001 09-25 Bayoumi Interview Transcript C." The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

102. Attached as Exhibit 258 is a true and correct copy of an excerpt of a document bearing Bates numbers PEC-KSA000358 to PEC-KSA000366, which was produced by Plaintiffs in this litigation.

103. Attached as Exhibit 259 is a true and correct copy of an excerpt of a document bearing Bates numbers FBI009087 to FBI009095, which was produced by the FBI in this litigation.

104. Attached as Exhibit 260 is a true and correct copy of an excerpt of the document bearing the file name "390 - 2001 09-25 Bayoumi Interview Transcript A." The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

105. Attached as Exhibit 261 is a true and correct copy of an excerpt of the document bearing the file name "398 - 2001 09-27 Bayoumi Interview Transcript A." The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

106. Attached as Exhibit 262 is a true and correct copy of a document bearing Bates numbers FBI004639 to FBI004656, which was produced by the FBI in this litigation.

107. Attached as Exhibit 263 is a true and correct copy of a document bearing Bates numbers FBI004657 to FBI004662, which was produced by the FBI in this litigation.

108. Attached as Exhibit 264 is a true and correct copy of a document bearing Bates numbers FBI004663 to FBI004671, which was produced by the FBI in this litigation.

109. Attached as Exhibit 265 is a true and correct copy of a document bearing Bates numbers FBI004672 to FBI004674, which was produced by the FBI in this litigation.

110. Attached as Exhibit 266 is a true and correct copy of a document bearing Bates numbers PEC-KSA000380 to PEC-KSA000385, which was produced by Plaintiffs in this litigation.

111. Attached as Exhibit 267 is a true and correct copy of a document bearing Bates numbers FBI000013 to FBI000022, which was produced by the FBI in this litigation.

112. Attached as Exhibit 268 is a true and correct copy of a document bearing Bates numbers FBI000023 to FBI000026, which was produced by the FBI in this litigation.

113. Attached as Exhibit 269 is a true and correct copy of an excerpt of the document bearing the file name “376 - 2001 09-23 Bayoumi Interview Transcript C.” The document was produced by Plaintiffs in this litigation. *See* ECF No. 7957-1. At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

114. Attached as Exhibit 270 is a true and correct copy of an excerpt of the document bearing the file name “388 - 2001 09-24 Bayoumi Interview Transcript E.” The document was produced by Plaintiffs in this litigation. *See* ECF No. 7957-1. At the time of production,

Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

115. Attached as Exhibit 271 is a true and correct copy of a document bearing Bates numbers FBI007999 to FBI008000, which was produced by the FBI in this litigation.

116. Attached as Exhibit 272 is a true and correct copy of a document bearing Bates numbers FBI008004 to FBI008005, which was produced by the FBI in this litigation.

117. Attached as Exhibit 273 is a true and correct copy of a document bearing Bates numbers FBI007913 to FBI007914, which was produced by the FBI in this litigation.

118. Attached as Exhibit 274 is a true and correct copy of an excerpt of the document bearing the file name "713 - D0676-X0333." The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

119. Attached as Exhibit 275 is a true and correct copy of an excerpt of the document bearing the file name "712 - D0661-X0332." The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom's Metropolitan Police Service. *See id.*

120. Attached as Exhibit 276 is a true and correct copy of a document bearing Bates number DA002263, which was produced by Dallah Avco in this litigation.

121. Attached as Exhibit 277 is a true and correct copy of a document bearing Bates number KSA0000001828, which was produced by Saudi Arabia in this litigation.

122. Attached as Exhibit 278 is a true and correct copy of a document bearing Bates numbers FBI004455 to FBI004457, which was produced by the FBI in this litigation.

123. Attached as Exhibit 279 is a true and correct copy of a document bearing Bates number KSA0000005288, which was produced by Saudi Arabia in this litigation.

124. Attached as Exhibit 280 is a true and correct copy of the article “The Saudi Connection: Inside the 9/11 Case That Divided the FBI” (New York Times, January 23, 2020, updated September 12, 2021) by Tim Golden and Sebastian Rotella. Kellogg Hansen employees acting under my supervision obtained the document from <https://www.nytimes.com/2020/01/23/magazine/9-11-saudi-arabia-fbi.html> and created the copy on February 6, 2024.

125. Attached as Exhibit 281 is a true and correct copy of an excerpt of the document bearing the file name “386 - 2001 09-24 Bayoumi Interview Transcript D.” The document was produced by Plaintiffs in this litigation. *See* ECF No. 7957-1. At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

126. Attached as Exhibit 282 is a true and correct copy of an excerpt of the document bearing the file name “392 - 2001 09-25 Bayoumi Interview Transcript b.” The document was produced by Plaintiffs in this litigation. *See* ECF No. 7957-1. At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

127. Attached as Exhibit 283 is a true and correct copy of an excerpt of the document bearing the file name “396 - 2001 09-29 Bayoumi Interview Transcript A.” The document was produced by Plaintiffs in this litigation. *See* ECF No. 7957-1. At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

128. Attached as Exhibit 284 is a true and correct copy of an excerpt of the document bearing the file name “682 - D0868-X0291.” The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

129. Attached as Exhibit 285 is a true and correct copy of a document bearing Bates number KSA0000006657, which was produced by Saudi Arabia in this litigation.

130. Attached as Exhibit 286 is a true and correct copy of a United States Department of Treasury Press Release titled “U.S. Dep’t of the Treasury, Treasury Department Statement on the Designation of Wa’el Hamza Julidan,” issued September 6, 2002.

131. Attached as Exhibit 287 is a true and correct copy of directions generated by GoogleMaps from Oklahoma City, Oklahoma to Falls Church, Virginia. Kellogg Hansen employees acting under my supervision entered the locations in Google Maps and created the copy on February 12, 2024 at 9:42 AM ET. The directions are also available at <https://www.google.com/maps/dir/Oklahoma+City,+OK/Falls+Church,+VA/@37.3736071,92.6137227,6z/data=!4m14!4m13!1m5!1m1!1s0x87ad8a547ef8d281:0x33a21274d14f3a9d!2m2!1d-97.5164276!2d35.4675602!1m5!1m1!1s0x89b64b6e7a4663ad:0x6e536688973d9759!2m2!1d-77.1710914!2d38.882334!3e0?entry=ttu>.

132. Attached as Exhibit 288 is a true and correct copy of a document bearing Bates number KSA0000007137, which was produced by Saudi Arabia in this litigation.

133. Attached as Exhibit 289 is a true and correct copy of an excerpt of the document bearing the file name “646 - D2090-X0483.” The document was produced by Plaintiffs in this litigation. *See ECF No. 7957-1.* At the time of production, Plaintiffs represented that the document was produced to them by the United Kingdom’s Metropolitan Police Service. *See id.*

134. Attached as Exhibit 290 is a true and correct copy of a document bearing Bates number KSA0000006965, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

135. Attached as Exhibit 291 is a true and correct copy of the Executive Summary of the 9/11 Commission Report.

136. Attached as Exhibit 292 is a true and correct copy of a document bearing Bates numbers KSA0000001230 to KSA0000001231, which was produced by Saudi Arabia in this litigation, and a certified English translation of the same.

137. Attached as Exhibit 293 is a true and correct copy of a transcript of a lecture given by Suleman Ahmer “Jihad, the Misunderstood Word” at WAMY – Okeechobee Summer Da’wah Camp in July 26, 1996.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 4, 2024  
Washington, D.C.

Gregory G. Rapawy  
Gregory G. Rapawy